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Monthly Environmental Compliance Report - January 5, 1994

G L Potter, Deputy Associate General Manager
Facility Management and Operations
EG&G Rocky Flats Inc

Comments on the subject report are in the attached mark-up copy EG&G should provide a consolidated response to the comments and questions in the attachment by February 28, 1994. Note that some of the comments are directed to the preparers of the report who are outside of your organization.

Please ensure your organization and any other EG&G owners review the text for accuracy and completeness before the report is issued. Also be sure that when compliance problems or other deficiencies are revealed corrective measures are also discussed since the report is distributed to the Colorado Department of Health.

If you have any questions, please contact me at extension 3751.

John C Leifer

John C Leifer, Leader
Regulatory Support Team
Operations and Waste Management

Attachment

cc w/o Attachments
D Ruscitto, AMOWM, RFO

cc w/Attachments

F Gerdeman, ESH RFO
W S Bennett, EG&G

Best Available Copy

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BATS/T130G

Reviewed for Addressee
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MONTHLY ENVIRONMENTAL COMPLIANCE REPORT

FOR THE REPORTING PERIOD
NOVEMBER 16, 1993 THROUGH DECEMBER 15, 1993

REPORT DATE JANUARY 5, 1994

EG&G ROCKY FLATS, INC
STANDARDS, AUDITS, AND ASSURANCE ORGANIZATION
MEASUREMENT AND ANALYSIS

LIST OF ACRONYMS

AGM	Associate General Manager
APEN	Air Pollutant Emission Notice
APR	Annual LDR Progress Report
ASRP	Accelerated Sludge Removal Project
CAD/ROD	Corrective Action Decision/Record of Decision
CDH	Colorado Department of Health
CO	Cadmium Oxide
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CMS/FS	Corrective Measures Study/Feasibility Study
CCC	Contaminants of Concern
CTMP	Comprehensive Treatment and Management Plan
D&D	Decontamination and Decommissioning
DD	Decision Document
DOE	Department of Energy
DOE, RFO	Department of Energy, Rocky Flats Office
E&WM	Environmental and Waste Management
EA	Environmental Assessment
EC	Environmental Coordinator
EG&G	EG&G Rocky Flats, Inc.
EPCRA	Emergency Planning and Community Right-to-Know Act
ESI	Environmental Impact Statement
FFCA	Federal Facilities Compliance Agreement
FM&O	Facilities Management and Operations
FONSI	Finding of No Significant Impact
FY	Fiscal Year
HHRA	Human Health Risk Assessment
HSP	Health and Safety Plan
IA	Industrial Area
IAG	Interagency Agreement
IDC	Item Description Code
IHSS	Individual Hazardous Substance Sites
IM/IRA	Interim Measure/Interim Remedial Action
LDR	Land Disposal Restriction
LLM	Low-Level Mixed Waste
LLW	Low-Level Waste
MOU	Memorandum of Understanding
NEPA	National Environmental Policy Act
NPDES	National Pollutant Discharge Elimination System
NREL	National Renewable Energy Laboratory
OPR	Operational Readiness Review
OJ	Operable Unit
PATS	Plant Action Tracking System
PCB	Polychlorinated Biphenyl
PPM	Parts Per Million
PVC	Polyvinyl Chloride
RCRA	Resource Conservation and Recovery Act
RFI/RI	RCRA Field Investigation/Remedial Investigation
RFP	Rocky Flats Plant
RTR	Real-Time-Radiography
SAA	Satellite Accumulation Area

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RTR	Real-Time-Radiography
SAA	Satellite Accumulation Area

PHEFACE

The Monthly Environmental Compliance Report (Report) is a deliverable under the EG&G Rocky Flats Inc (EG&G) Environmental Compliance Program (ECP) and is prepared by the Standards Audits and Assurance Measurement and Analysis (M&A) group

This Report is primarily based on information collected from numerous Rocky Flats Plant (RFP) organizations and is not meant to detail all environmental deficiencies but rather to discuss highlights and trends of environmental performance. This document is not intended to represent a complete picture of environmental compliance, but rather provides up-to-date information for internal review and planning. The Report is reviewed for accuracy and completeness prior to each month's publication by appropriate program managers.

The scope of this Report covers major environmental compliance issues at both the RFP and the Oxnard California facility. This Report presents a summary and status of the various environmental compliance items researched for the period covering November 16, 1993, through December 15, 1993.

This report is not intended to represent a comprehensive review or analysis of environmental compliance at the Rocky Flats Plant but rather is intended to provide information for internal management review and planning. The data in this report is primarily based on data contained in computer tracking systems, corrective action tracking systems, with supplementation by appropriate building line management and regulatory program managers. Therefore, this report is neither intended to detail all environmental deficiencies contained in PATS nor at the Plant but rather to discuss highlights and trends of environmental performance.

LIST OF ACRONYMS (con't.)

SARA	Superfund Amendment and Reauthorization Act
SVS	Soil Vapor Surveys
SW	Surface Water
TBD	To Be Determined
TRAMPAC	TRUPACT-II Authorized Methods for Payload Control
TRM	Training Reference Manual
TRU	Transuranic
TRU-Mix	Transuranic Mixed
TRUPACT	Transuranic Package Transporter
TSCA	Toxic Substances Control Act
VOC	Volatile Organic Compound
WEMS	Waste and Environmental Management System
WIPP	Waste Isolation Pilot Plant

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1 0 HIGHLIGHTS

Environmental Compliance Responsibilities Defined - The final draft of the MOU for Environmental Responsibilities went out for review by all AGMs and their designees on September 13, 1993. Comments received are in the process of being addressed with a final draft for AGM signatures scheduled to be completed January 1994.

Building 250 Windsite Turnover to NREL Five actions were assigned to Facility Operations to complete the Windsite turnover to NREL. The hydraulic oil spill drums, the excess charcoal, and three lead acid batteries were dispositioned by November 24, 1993. Containers of antifreeze and sulfuric acid were removed and dispositioned by December 17, 1993.

Satellite Unit Close to Capacity - Building 371 Analytical Laboratory glovebox RCRA satellite unit 371 1959 is approaching capacity with sample liquids in four-liter bottles. No receiving unit is immediately available for transferring the material when the capacity is reached. Immediate transfer to the 374 treatment process is not possible due to lack of procedures for introduction of bottled (as opposed to piped) liquids, and the 774 treatment facility is fully committed until April to supporting the Solution Stabilization Project. The lab will be shut down by 371 Operations Management in approximately six weeks prior to reaching capacity in the satellite unit. A shutdown will adversely impact Building 374 treatment and other plant activities. 371 Operations Management has requested assistance in writing from E&WM, which runs the Building 374 and 774 liquid treatment facilities. *? what is this?*

Regulated Waste Operations Drums Shipped - Fifty six hazardous waste drums were shipped to Chemical Waste Management. The waste, part of the Federal Facility Compliance Act backlog, consisted of combustibles, solvents, paints, coolants, used oil, oil filters, and formaldehyde.

Hanford Approval to Ship Waste - Hanford has granted approval for RFP to ship sewage sludge and asbestos contaminated low level waste to Hanford for disposal. The first shipment to Hanford is expected by the second quarter of 1994.

Response to CDH Inspection Issue - On November 18, 1993, CDH wrote a letter to EG&G which discussed seven issues or comments that had been raised as a result of CDH inspections of the RFP. On November 24, 1993, EG&G responded to CDH's letter. EG&G's response included a number of actions taken or to be taken to address CDH's comments and issues.

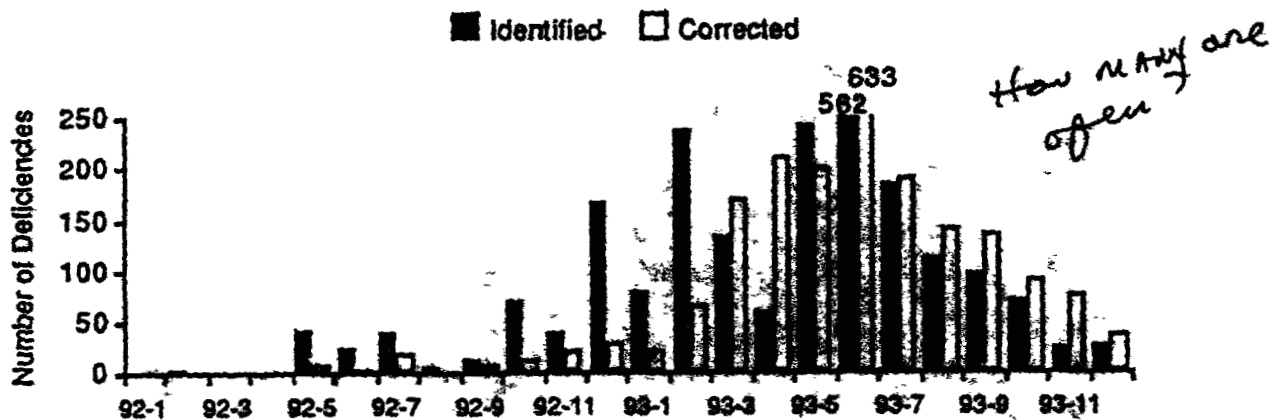
Co-application for NPDES Permit Renewal - On August 18, 1993, the EPA notified both DOE and EG&G that "it is both necessary and appropriate to have both DOE and the contractor (EG&G) apply as co applicants" for the renewal of the RFP NPDES permit. EG&G agreed to this requirement and together with DOE submitted revised NPDES application forms that included the signature of the EG&G General Manager for Rocky Flats. The revised application was submitted by the October 18, 1993 deadline. EPA has initiated efforts to prepare a draft permit outline and to begin discussions of specific permit provisions.

Preliminary OU 1 RFI/RI Deliverance to CDH and EPA - Copies of the preliminary OU 1 Final Phase III RCRA RFI/RI Report were delivered to the EPA and CDH. The regulatory agencies indicated that they may accept the November 1993 Phase III RFI/RI Report as the Final Report. Because of the stop work order, the scheduled IAG Table 6 milestone for the Final Phase III RFI/RI Report was rescheduled from November 15, 1993 to March 4, 1994. The schedule was expedited and four copies of Volumes I and II of the Pond Water IM/IRA DD were delivered to the regulatory agencies on November 22, 1993.

2.0 ENVIRONMENTAL DEFICIENCY IDENTIFICATION AND CORRECTION

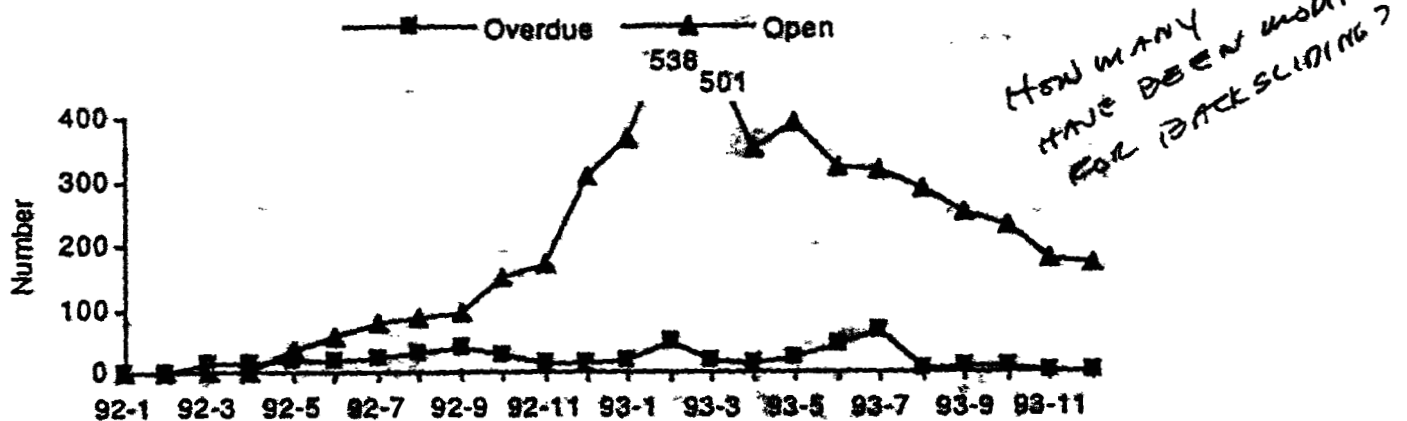
This section only reports on deficiencies which are tracked in PATS as environmental deficiencies

2.1 Deficiencies Identified/Deficiencies Corrected - The number of environmental deficiencies identified and the number of deficiencies corrected as recorded in PATS



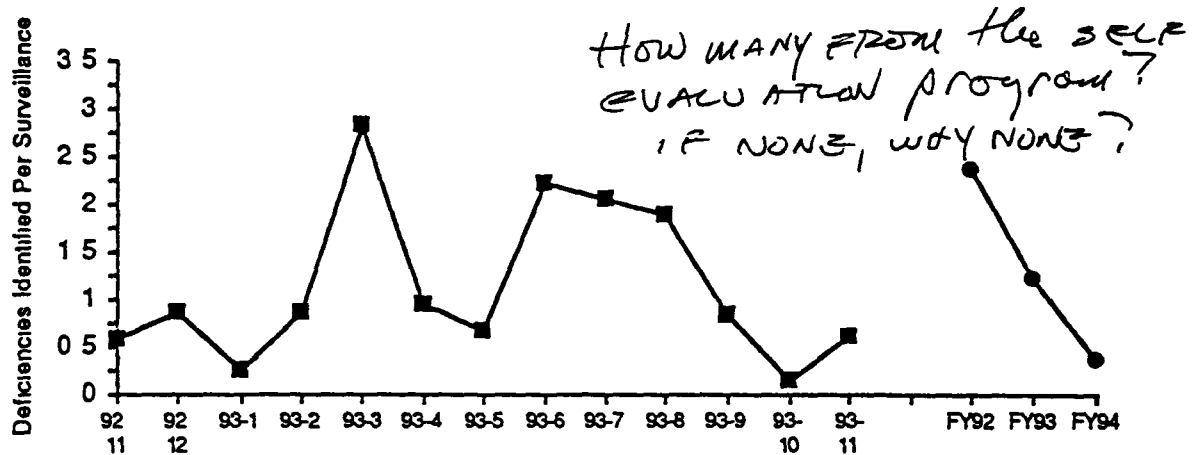
The number of deficiencies identified each month continues to decline. Only 27 new deficiencies were identified in the current reporting period, while 36 were corrected

2.2 Open and Overdue Corrective Actions - The number of open and overdue environmental deficiency corrective actions, as recorded in PATS



EG&G RF continues to reduce the number of open corrective actions. The number of overdue corrective actions has been reduced from over 60 in July 1993 to two in December 1993

- 2 3 **Deficiency Identification Rate** - The number of new deficiencies identified relative to the number of surveillances conducted. This information is based on only those surveillances conducted by the EG&G RF Environmental and Waste Surveillance organization. The surveillance results are depicted by calendar month.



The FY94 decrease in the deficiency identification rate is attributed to the type of surveillances performed. During October and November 1993, 86 of the 115 surveillances conducted were to inactivate RCRA areas. The rate on the inactivation surveillances was 0.10. The rate on the remaining 29 surveillances was 1.10, which is similar to the FY93 rate of 1.23.

- 2 4 **Recurring Deficiencies** - A performance indicator for recurring deficiencies is under development. The target for first reporting of this indicator is March 1994. Two recurring deficiencies were identified by the EG&G RF Environmental and Waste Surveillance organization during November 1993 surveillances.

3 0 BUILDING LINE MANAGEMENT

3 1 Facilities Operations Environmental Program

Accomplishments/Initiatives

Building 250 Windsite Turnover to NREL Five actions were assigned to Facility Operations to complete the Windsite turnover to NREL. The hydraulic oil spill drums, the excess charcoal, and three lead acid batteries were dispositioned by November 24, 1993. Containers of antifreeze and sulfuric acid were removed and dispositioned by December 17, 1993.

Satellite Accumulation Area Action Plans Eleven Action Plans have been established to reconfigure SAAs to meet CDH guidance. Five Action Plans were completed during this reporting period bringing completion to ten Plans, with the remaining Plan scheduled for completion in January 1994.

Internal Communications - A chain of communication was established to allow issues to rise from the floor (Waste Generators) and go to the AGM level, if necessary for resolution. The Unit Owners are to establish a mechanism for their Waste Generators to raise issues, work with the EC and/or bring forward to issue meetings. Issues and information meetings have been established on a weekly basis for RCRA Custodians, Unit Owners, and Building Managers.

Issues/Problems

Unknown Excess Chemicals Discovered at Building 334 - Building 334 has discovered four unknown excess chemicals. A disposition form has been completed and WEMS barcodes have been placed on each container. Sample Coordination has been notified that the chemicals are ready to sample. The chemicals have been placed in a 90-day SAA near Building 334 as a best management practice recommended by CDH until characterization is completed.

3 2 Plutonium Operations**Issues/Problems**

90-Day Accumulation Areas - Two 90-day Accumulation Areas in Buildings 779 and 991 require an extension of the 90-day accumulation time limit from CDH in order to remain in compliance. Plutonium Operations Waste and Environmental Compliance has requested a 30-day extension to allow more time for laboratory characterization of excess chemicals in the units. Delays in laboratory analysis are attributed to reductions in staffing levels, available analytical capability and unplanned maintenance of laboratory apparatus. Recent retirements compounded the situation causing administrative delays and loss of process knowledge. To prevent extension requests for other units, high priority will be given unknown wastes to assure characterization within the 90-day time frame.

RCRA Barrel Found Unlocked - On December 16, 1993, a Laboratory Technician reported that an RCRA barrel was left unlocked overnight in Building 559. The lock was on the barrel ring, but not clasped. The custodian checked to ensure that entries on the traveler matched items on the bill. No discrepancies were observed.

*NOTED BY
DH
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ISSUE* Building 776 Receives Unpermitted Excess Waste - Building 776, RCRA Units No. 11 and 69, is continuing to receive excess chemicals from buildings within the Protected Area. This continues to be a violation of the Interim Status permit for Units 11 and 69. These units are accepting wastes excess chemicals as a matter of default as not to violate the 90-day Accumulation Areas allowable time frame.

3 3 Residue Operations**Accomplishments/Initiatives**

Unknown Waste Characterized - Seven unknown wastes in Box F20, Room 180F, Building 771 have been characterized. One item was determined to be nonhazardous by process knowledge. Two items were determined to be nonhazardous by analysis. The remaining four wastes were determined by analytical means to be hazardous for corrosivity only. These wastes have been managed as hazardous in a 90-day accumulation area and will be removed from the facility by December 28, 1993.

IDC 331 (Used Ful-Flo Filters) Drums - An assessment of short-term problems associated with IDC 331 Drums potentially containing both nitric acid and caustics has been completed. This study cited no immediate safety risks. The Residue Elimination Project has agreed to characterize and repackage these drums in 1995.

Issues/Problems

Operations Manager's Assessment of RCRA Ownership - The Operations Manager for Building 771/774 has completed an assessment of RCRA ownership within the facility. Several

weaknesses in owner awareness of responsibilities and operators regarding waste generation and storage were identified. An action plan has been developed and ^{tasks} initiated to strengthen ownership of RCRA regulated units in Building 771.

Unauthorized Accumulation of Waste Building 771 management discovered that 13 liters of uranyl nitrate waste was moved from room 159 to Box MT2 Room 146 Building 771. Box MT2 was not authorized for any hazardous waste. The incident was critiqued and the box was established as a 90 day accumulation area.

Missed Inspections - Ninety day Accumulation Area 771 2020 (GB F20 Room 180F, Building 771) was established on September 30, 1993 to manage seven unknown wastes. Weekly inspections of this area were to be initiated on October 6, 1993 however, they did not commence until December 1, 1993. The incident was critiqued and inspection logsheets for remaining areas in Building 771 were reviewed to ensure no other inspections were missed.

Improper Storage of Hazardous Waste It was discovered that one 55 gallon drum containing ten 4 liter containers of seal liquid from the Bingham vacuum system was improperly marked and improperly stored in Room 146 Building 771. Each container in the drum had a pH of 0.4 to 0.5 but the drum was not labeled or managed as a hazardous waste. Corrective action included establishment of a SAA in Room 146 and proper labeling of the drum as a hazardous waste.

↑ WHY AN SAA, SOUNDS LIKE A ONE-TIME USE

3.4 400 Operations

Accomplishments/Initiatives

Excess/Waste Chemical Status Building 460 received their first batch of disposition forms from Waste Regulatory Programs on Wednesday December 15, 1993. The area Environmental Coordinator will be working with seven chemical owners to begin proper management of 75 waste chemicals. Approximately 200 Building 444 disposition forms have been returned to the building. Of the 200, approximately 100 chemicals have been characterized as hazardous. Chemical owners within the building are working to establish Custodians and 90 day Areas. In Building 439/440 Waste Regulatory Programs has not yet returned any Excess/Waste Chemical Disposition Forms.

3.5 800 Operations

Accomplishments/Initiatives

800 Area Spill Response Equipment 800 Area Environmental Programs ECs conducted a survey of the 800 Area spill response cabinets to ensure the appropriate types and quantities of spill response equipment are readily accessible. Representatives from Industrial Hygiene, Waste Regulatory Programs and the Fire Department participated in the survey of existing spill response equipment in Buildings 865/866, 883, 889 and 881. Representatives from these groups made recommendations for ordering more supplies. A purchase requisition for additional spill response supplies was completed and submitted to Procurement.

GORD - SOUNDS LIKE SOMETHING TO SPREAD TO OTHERS

800 Area RCRA Tank Inspection Procedures 800 Area ECs are working with the Plant Procedures Group and 800 Area Utilities to prepare RCRA tank inspection procedures for RCRA Custodians in Buildings 866, 883 and 887.

Excess Cadmium Oxide Equipment and materials used in Building 886 Room 101 are generally considered radiologically contaminated. Radiological Engineering is reviewing excess CdO from this room and its history to determine if the CdO can be returned to the manufacturer.

Representatives from Radiological Engineering have requested a meeting with Criticality Analysis Engineering personnel who have first-hand knowledge of the history of the CDO. The meeting took place the week of December 20-24, 1993.

Is this a RCRA unit?

Building 865 Beryllium Electrorefining Cell Stripout - Beginning this month, Metallurgical Technology Support will be conducting a bench scale treatability study to neutralize the beryllium chloride solution in the beryllium electrorefining cell in Building 865. The resultant material would be salts, water, and beryllium oxide. The study is expected to run approximately nine weeks. 800 Area Operations is funding this initial bench scale effort under Work Package #47205 not to exceed \$60K.

Drum Analysis Per CDH Inspection Closeout - Analysis for two partially filled drums in the LLW storage area in Building 881 has been initiated per a request by CDH during their November 8, 1993 inspection of Building 881 RCRA satellites. One of the drums contains water from OU 15 Building 881 sampling activities and the other drum contains used oil from maintenance activities in Building 881.

This info is owed to CDH

3.6 Building 371 Operations

Issues/Problems.

CDH Inspection of the Stacker Retriever - A CDH inspection of the Building 371 stacker retriever vault and a demonstration of a stacker RCRA inspection resulted in no findings and a request for information. The information requested concerned inspection of mixed residue containers in the stacker when the residues randomly selected are among those which cannot be moved without approval. The information requested was provided to CDH through the FM&O Deputy AGM for Environmental Compliance.

Inadequate RCRA Inspections - Two radiologically contaminated mixed residue tank rooms in Building 371 have been subject to inadequate RCRA inspections for several months. The required daily observations through windows in doors were not accomplished satisfactorily because the doors were obstructed by contaminated plastic tents installed to facilitate entry into the rooms in supplied breathing air. When Operations Management became aware of the problem, the rooms were entered to assure no spills had occurred. Decontamination has commenced. Continuing observations will be made as rooms are entered for decontamination. The subject RCRA unit files will be annotated to document this problem, and a directive is being prepared and discussed with managers to enhance line management ownership of environmental compliance. Inspectors will be formally briefed on the significance and seriousness of logsheet entries.

Spill Cleanup - Decontamination of Rooms 3559 and 3563 commenced, and is expected to take a couple of months. Work is not progressing as quickly as planned due to supplied breathing air system equipment failures; the system is expected to be repaired before the end of the year. Decontamination of Room 1117 will start upon completion of decontamination of Rooms 3559 and 3563. Room 1117 is heavily contaminated and its cleanup is expected to take the rest of the fiscal year. Concurrent decontamination is precluded by availability of only a single air cart and a limited number of operators.

Satellite Unit Close to Capacity - Building 371 Analytical Laboratory glovebox RCRA satellite unit 371-1959 is approaching capacity with sample liquids in four-liter bottles. No receiving unit is immediately available for transferring the material when the capacity is reached. Immediate transfer to the 374 treatment process is not possible due to lack of procedures for introduction of bottled (as opposed to piped) liquids, and the 774 treatment facility is fully committed until April to supporting the Solution Stabilization Project. The lab will be shut

down by 371 Operations Management in approximately six weeks prior to reaching capacity in the satellite unit. A shutdown will adversely impact Building 374 treatment and other plant activities. 371 Operations Management has requested assistance in writing from E&WM, which runs the Building 374 and 774 liquid treatment facilities.

3.7 Plant Services

No new significant information for this reporting period.

3.8 Environmental and Waste Management/Waste Operations

3.8.1 Regulated Waste Operations

No new significant information for this reporting period.

3.8.2 Waste Solidification Operations - who is this?

Accomplishments/Initiatives

Closure and D&D plans are being developed for Building 788 and associated Unit #48. Internal EG&G review will be initiated prior of submittal to DOE/CDH. The schedule for the D&D is being developed and will be submitted to DOE RFO for review.

ASRP - The ASRP is in progress. The project consists of removing the sludge from the Solar Evaporation Pond (B South), C Pond, and Clarifier then transferring the sludge to storage tanks located on the 750 Pad Tents 3, 4, and 6. Treatment of the sludge will be pursued once repository criteria are defined. The storage tanks have been procured and are being received and installed. The first four of 71 tanks have arrived and have been placed in Tent 3. WHAT THIS

Regulated Waste Operations Drums Shipped Fifty-six hazardous waste drums were shipped to Chemical Waste Management. The waste part of the Federal Facility Compliance Act backlog, consisted of combustibles, solvents, paints, coolants, used oil, oil filters, and formaldehyde.

Excess Chemicals Removed From Building 993 The removal of 1,203 excess chemicals stored in Building 993 was supported with the review of documents and the packaging and movement of 36 drums. The project was completed prior to the December 10, 1993 commitment deadline.

Issues/Problems

Additional Permitted Capacity Requested Regulated Unit #10 is within four drums of the permitted limit. Liquids with the compatibility codes 3A and 4A can no longer be accepted. Additional permitted capacity has been requested by Regulated Waste Operations. Waste Program personnel are pursuing a permit modification from CDH to allow additional storage at Unit #1 for LLM waste.

Permit Change Requested - Excess chemicals were received into permitted units which have P and U listed waste codes. Additionally, the same excess chemicals also have characteristic codes which are not permitted. A permit modification will be submitted to EPA through DOE. One letter has been submitted from EG&G to DOE requesting the permit changes.

3.8.3 Liquid Waste Systems

No new significant information for this reporting period.

3 9 Non-Destructive Assay/Waste Assay and Shipping

Roof Repair Completed - As a precaution to RCRA storage regulations, leaking rain gutters in the Building 664 posed a concern to hazardous waste being stored and was repaired. A leaking roof in the highbay where containers are temporarily stored was also repaired to meet general requirements of RCRA storage and to successfully meet the weekly inspections with corrective actions.

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30 ACSO
P 487
[Excess Chemical Drums - In order to meet a commitment to the State of Colorado, 12 excess chemical drums were accepted by Building 664 from Building 883 for RTR and storage. Several EPA codes were identified as not being permitted in Building 664 or anywhere on plantsite. A modification to the State RCRA Permit will be prepared to incorporate any other EPA codes to help alleviate concerns on what chemicals can actually be stored in the permitted units.

3 10 Environmental Restoration/Facilities Operations Management

No new significant information for this reporting period.

3 11 Environmental and Quality Training

87 Students Complete Waste Determination and Waste Stream Residue Identification Course Completed - Environmental and Quality Training has delivered the Waste Determination and Waste Stream Residue Identification course to 87 students since course inception in late October 1993. The course provides students with an understanding of EPA waste characterization processes, characteristic wastes and listed wastes for correct waste identification. An analysis of the student course critiques indicates the students believe the course is beneficial.

21 Students Complete Emergency Response Course Completed - Environmental and Quality Training has delivered the Emergency Response course to 21 students since being introduced in September 1993. The course provides students with skills and practical experience to take an offensive approach to mitigate hazardous waste spills. An analysis of the student course critiques indicates the students believe the course provides applicable information to problems they may encounter at the Plant.

is this all -
UNIDENTIFIED THERE MORE
in 3 mos

4 0 ENVIRONMENTAL AND WASTE MANAGEMENT PROGRAMS**4 1 Waste Management****4 1 1 Radioactive Waste****Accomplishments/Initiatives**

Hanford Approval to Ship Waste - Hanford has granted approval for RFP to ship sewage sludge and asbestos contaminated low-level waste to Hanford for disposal. The first shipment to Hanford is expected by the second quarter of 1994.

4 1 2 Colorado Hazardous Waste Regulations

Appendix A contains two tables which provides the status of RCRA submittals and permits to CDH.

Issues/Problems

Response to CDH Inspection Issue On November 18, 1993, CDH wrote a letter to EG&G which discussed seven issues or comments that had been raised as a result of CDH inspections of the RFP. The topical areas involved were (1) management of soils and other environmental media, (2) the waste and environmental management system, (3) the PATS, (4) the waste stream and residue identification and characterization program, (5) excess chemicals, (6) organizational responsibilities, and (7) management of identified noncompliances. On November 24, 1993, EG&G responded to CDH's letter. EG&G's response included a number of actions taken or to be taken to address CDH's comments and issues.

CDH keeps asking for this

To date, all actions scheduled to be taken have occurred with one exception. In response to issue 6 regarding organizational responsibilities, an MOU which described organizational responsibilities for environmental compliance activities was to be performed by December 20, 1993. This MOU is tentatively scheduled to be completed in January 1994.

4.1.3 Toxic Substances Control Act

Accomplishments/Initiatives

Storage of Radioactive PCB Wastes - The TSCA Program is continuing to pursue a compliance agreement with EPA Region VIII on the continued storage of radioactive PCB wastes beyond one year. A draft strategy agreement has been prepared and sent to DOE, HQ for comment and approval. DOE, RFO, EG&G, and EPA Region VIII will resume negotiations to finalize this agreement upon DOE HQ approval.

Documentation Preparation for Shipment of PCB Wastes - The TSCA Program has provided DOE RFO with updated information on PCB wastes subject to the DOE shipping moratorium. Waste Regulatory Programs and Regulated Waste Operations are reviewing existing documentation to determine which PCB waste drums have enough information and documentation to submit to Radiological Engineering for evaluation for shipment upon the lifting of the DOE shipping moratorium.

Not complete
see file of
dist. by
B443

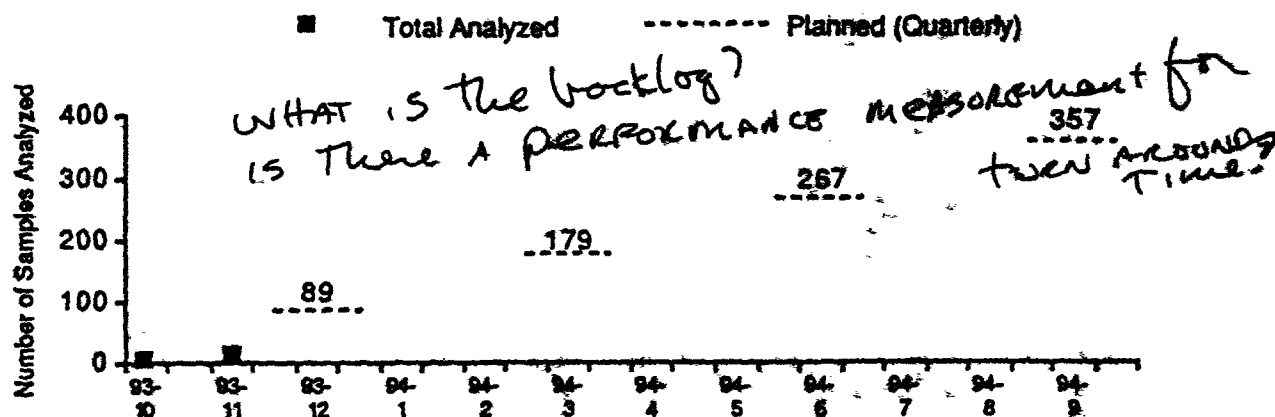
Remediation of Transformer Site Completed EG&G has completed the remediation of the transformer site 443.2 previously contaminated with PCBs from past spills. The soils within this site were removed with a goal of 2 ppm PCB concentration. Analytical data indicates one area at 3.6 ppm PCB, and all other areas below 2 ppm PCB. All analytical data confirms all areas within the site well below the TSCA standard for outdoor electrical substations. A final report will be submitted to DOE RFO for subsequent transmittal to EPA Region VIII.

4.1.4 Federal Facilities Compliance Agreement Program

No new significant information for this reporting period.

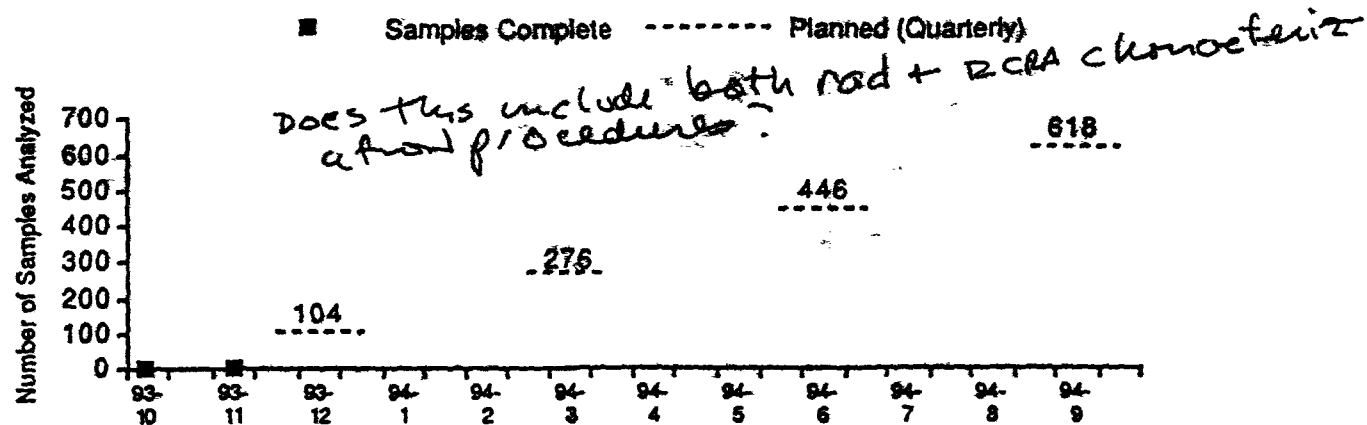
Performance Indicators

- 4 1 5 Non-Radioactive Waste Characterization - Plan performance (by calendar month) in completing analyses of non-radioactive waste samples collected in FY94. These samples are required to characterize waste streams, residues, and non-routine waste and spills



As of November 30, 1993, only 16 samples had been completed. This is caused by the time required to complete an analysis and the fact that only samples collected since October 1, 1993, are being counted. It is anticipated that the first quarter goal will be attained by the end of December 1993.

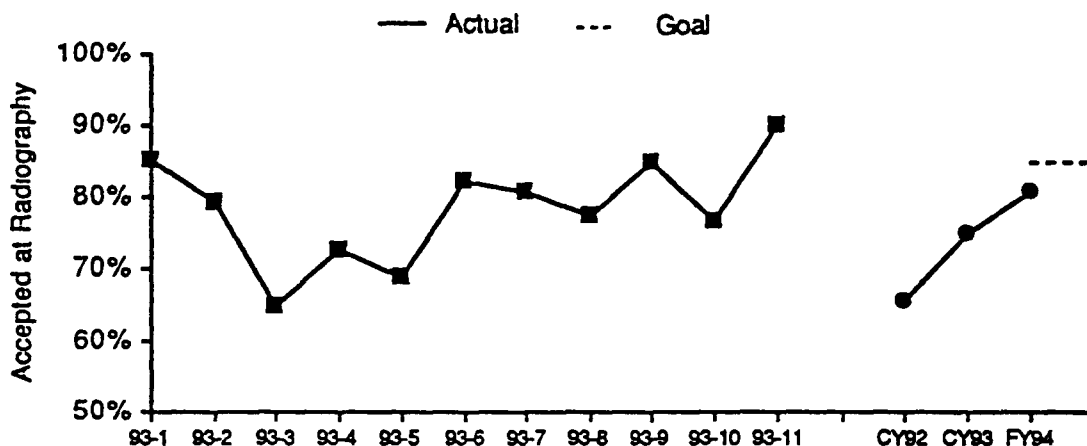
- 4 1 6 Radioactive Waste Characterization - Plan performance (by calendar month) in completing analyses of radioactive waste samples collected in FY94. These samples are required to characterize waste streams, residues, and non-routine waste and spills



As of November 30, 1993, only five samples had been completed. This is caused by the time required to complete an analysis and the fact that only samples collected since October 1, 1993 are being counted. It is anticipated that the first quarter goal will be attained by the end of December 1993.

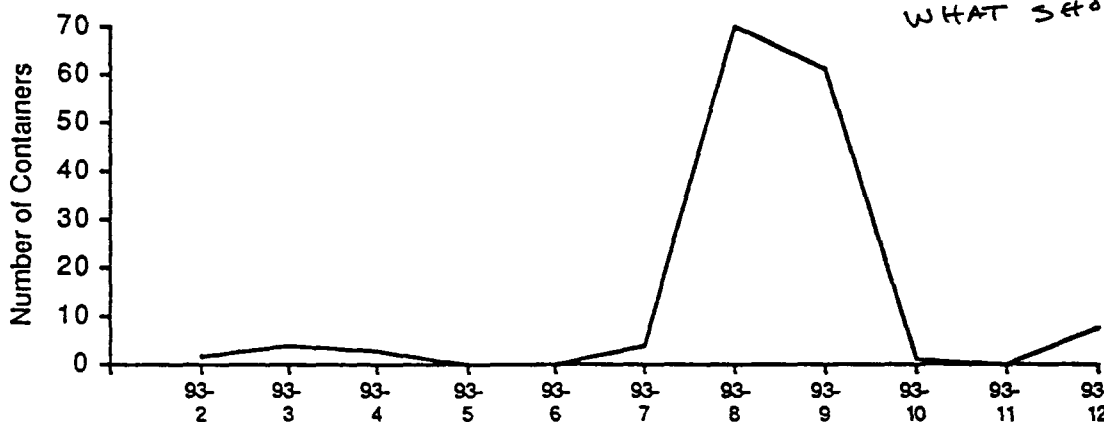
18

4 1 7 Waste Packaging Quality - The percentage of waste containers accepted in accordance with RTR acceptance criteria. The RTR inspection results are depicted by calendar month.



The acceptance rate continues to increase. However, the number of containers radiographed each month has been relatively low in recent months. It has decreased from an average of over 200 per month to only 75 per month for October and November 1993.

4 1 8 Waste Container Accumulation Area Time Violations - The number of waste containers in 90-day accumulation areas longer than 90 days as of the end of the reporting period, as recorded in WEMS. Note that this indicator does not report the total number of violations occurring during the month.



There were eight violations recorded in WEMS as of the last day of the reporting period (December 15, 1993). Three are attributed to inaccuracies in WEMS. For two containers, the start date was one month too early. The third container had been moved from the SAA but WEMS had not yet been updated. The other five containers exceeded the 90-day limit due to delays in obtaining laboratory analyses. See Section 3.2, 90-day Accumulation Areas.

4 1 9 **Non-current Waste Custodian and Waste Generator Training** - This indicator is under development with an expected first reporting date of February 1994.

4 2 Environmental Protection

4 2 1 National Environmental Policy Act

Issues/Problems

The following table contains a schedule of NEPA reviews based upon upcoming plant projects:

NEPA Schedule

Project Under Review	Start Date	End Date	Result	Comments
Bldg 707 Thermal Stabilization EA	June-93	12/31/93		EA completed, Public comment period completed 11/9/93 Response to comments underway by DOE
Stockpile Reliability Evaluation Program Transfer	Jul-93	Nov-93	Eliminated	This project has been transferred to Los Alamos for inclusion in its similar EA
Surface Water Structures EA	Jul-93	Feb-94		Comments received from RFO Oct 21 Response to comments proceeding with additional information being added Expected delay Feb 94.
Sitewide EIS		Dec-96		

Building 707 Thermal Stabilization Environmental Assessment - EG&G has been tasked with preparing an EA prior to the resumption of thermal stabilization activities in Building 707. This EA is of extremely high priority. The documentation process began in early June resulting in a draft EA on August 2, 1993 and final EA on September 10, 1993. Public comment period ended November 9, 1993. A FONSI is anticipated in late November or December 1993.

Surface Water Structures Environmental Assessment - This project involves the performance of maintenance activities on surface water structures such as dams, spillways, gates, channels, etc. due to excessive vegetation and sedimentation. The documentation process for this project is underway and a draft EA was completed in August 1993 and transmitted on September 3, 1993, to DOE, RFO. DOE comments on the draft are being addressed and the final document is being prepared. A FONSI is expected in December.

Sitewide EIS - The sitewide EIS is expected to be completed in late FY96.

4 2 2 Clean Water Act

Accomplishments/Initiatives

Co-application for NPDES Permit Renewal - On August 18, 1993, the EPA notified both DOE and EG&G that "it is both necessary and appropriate to have both DOE and the contractor (EG&G) apply as co-applicants" for the renewal of the RFP NPDES permit. EG&G agreed to this requirement, and, together with DOE, submitted revised NPDES application forms that included

the signature of the EG&G General Manager for Rocky Flats. The revised application was submitted by the October 18, 1993 deadline. EPA has initiated efforts to prepare a draft permit outline and to begin discussions of specific permit provisions.

Preparations for South Platte River Basin Triennial Review - On November 1, 1993, DOE and EG&G submitted a proposed statement of basis and purpose to the Colorado Water Quality Control Commission in preparation for the April 1994 triennial review of the South Platte River Basin. Rocky Flats has proposed a change in the classification of Segments 4 and 5 of Big Dry Creek to remove aquatic life 2 as a classified use. Segment 1 of Big Dry Creek, downstream of Rocky Flats, has no water quality standards based on the aquatic life 2 classification, and the Rocky Flats proposal is to treat the upper segments in a similar manner. Because surface water releases from Rocky Flats are controlled and other flows are sporadic, Big Dry Creek does not support a significant fish population. The parameter of primary focus in this effort is un-ionized ammonia, which is toxic to fish. To meet the current stream standard, ammonia removal facilities must be added to the Rocky Flats waste water treatment plant, adding capital costs and increasing operating expenses. These funds can be directed at more pressing problems if the DOE/EG&G proposal is approved by the commission in April.

4.2.3 Clean Air Act

Accomplishments/Initiatives

Air Pollutant Emission Notice Update Project - The APEN updates for RFP sources of hazardous air pollutants were submitted to DOE RFO on December 13, 1993, and were transmitted to CDH on December 15, 1993. This is the second phase of the air emission inventory update requirements set forth in the May 1993 revision of the Colorado Air Pollution Prevention and Control Act. Phase 1 of this project was focused on sources of criteria pollutants and was completed in December 1992. The Air Quality Division conducted field investigations of all current RFP operations and revised the existing APENs and supporting documentation to reflect the current and planned plant operations. This submittal was due to CDH by December 31, 1993.

Air Emission Permit Reviews - There are a number of sources at RFP that are currently subject to a CDH issued air emission permit. In some cases, these processes are no longer in service with no plans for restart in the future. In other cases, these operations are either categorically exempt from APEN reporting requirements such as support laboratories and maintenance painting, or emit regulated pollutants at rates below the current reporting thresholds listed in Regulation No. 3, Part A, Section II B. According to Regulation No. 3, Part B, Section III D 1 a, any source that is exempt from APEN reporting requirements is also exempt from the air emission permitting requirements outlined in Regulation No. 3, Part B. Thus, a formal request was made to CDH for review of the following permits for cancellation for the reasons noted above. The following table lists the permits submitted to CDH:

<u>Building No.</u>	<u>Operation</u>	<u>CDH Permit No.</u>	<u>Comment</u>
122	Incinerator	C 12 931	Unit out-of service
771	Incinerator	12JE932	Unit out of service
776	Incinerator	C 13, 022	Unit out-of service
123	Urinalysis Process	86JE018	Categorical Exemption
333	Paint Spray Booth	91JE300 1	Categorical Exemption
440	Paint Spray Booth	91JE537-1	Below Threshold
440	Paint Spray Booth	91JE537 2	Below Threshold
995	Sludge Dryer	91JE430	Below Threshold

General Permit Issues - An application has been submitted to CDH to include all diesel-fired emergency generators, pumps and compressors at Rocky Flats Plant under one general permit. This approach will establish a cap on emissions from these sources while still providing operational flexibility to run these units on an as-needed basis.

4.2.4 Federal Insecticide, Fungicide, and Rodenticide Act

No new significant information for this reporting period.

4.2.5 Emergency Planning and Community Right-to-Know Act

Accomplishments/Initiatives

Filing Preparations for Tier II Reports - Preparation has begun for the completion and filing of the Emergency and Hazardous Chemical Inventory Forms (Tier II Reports) for the 1993 calendar year. SARA Title III (EPCRA) section 312 mandates that RFP complete and file the Tier II reports with the Local Emergency Planning Committee, and State Emergency Response Commission, and the Rocky Flats Fire Department by March 1, 1994. Project plans (due December 31, 1993) and a level 4 procedure for completing the Tier II report (due November 26, 1993) have been completed. A chemical inventory is in progress and is approximately 90 percent complete. Chemical Trackers of the Chemical Tracking and Control Systems Division are inventorying the chemical stocks in the more than 93 building known to have EPCRA reportable chemicals. A chemical inventory report is due January 31, 1994.

4.3 Environmental Restoration

Issues/Problems

Ruptured "T" Joint at Operable Unit 2 Treatment System - A six-inch diameter PVC pipe (located at the OU 2 water treatment system) ruptured at the "T" joint releasing surface water into the secondary containment. The water in the secondary containment measured three inches deep by eight feet wide by twenty feet long. The water treatment system was immediately shut down and Radiological Engineering determined there was no radiological concern. The water was pumped from the containment back into the system and when the floor of the secondary containment dried, an Alpha and Beta Gamma Survey was conducted with the results of no detectable contamination. CDH and EPA were notified.

Release from an Influent Water Line - A subcontractor employee discovered the release from an influent water line in response to an alarm signaling that a release has occurred. The subcontractor noticed a slow leak coming from a connection in the secondary containment portion of the influent pipeline. The primary pipeline was found to be leaking from a connection in the line.

The estimated amount of material released to the environment was ten gallons by visual determination of the size of the wetted area. Constituents found in the contaminated water support the fact that the contaminated water is an "F001" listed hazardous waste.

An emergency work package was initiated to repair the line. The line was repaired and returned to service on Wednesday, December 8, 1993. The released material was not directly recoverable because it soaked into the soil. Based on previous analytical results of the contaminated water, the immediate removal of the affected soil is not required because the contaminant concentrations in the soil do not pose an unacceptable risk to human health and the environment. A RCRA Contingency Plan has been implemented and will be addressed in the quarterly update of the Historical Release Report.

4 3 1 Comprehensive Environmental Response, Compensation, and Liability Act**Accomplishments/Initiatives**

Preliminary OU 1 RFI/RI Deliverance to CDH and EPA - Copies of the preliminary OU 1 Final Phase III RCRA RFI/RI Report were delivered to the EPA and CDH. The regulatory agencies indicated that they may accept the November 1993 Phase III RFI/RI Report as the Final Report. Because of the stop work order, the scheduled IAG Table 6 milestone for the Final Phase III RFI/RI Report was rescheduled from November 15, 1993 to March 4, 1994. The schedule was expedited and four copies of Volumes I and II of the Pond Water IM/IRA DD were delivered to the regulatory agencies on November 22, 1993.

Surface Water IM/IRA TSR - DOE received all of the data concerning the additional samples at SW Station SW-132. The Final SW IM/IRA Treatability Study Report will be completed after comments are received from the agencies on the Draft report. The sampling plan is being revised for the SW IM/IRA.

The OU 2 SVS field work, including the field report, was completed in early December. The sampling locations were surveyed. All five of the IHSSs were sampled and the data was analyzed. The Final Baseline SVS and Detailed SVS Report will be combined into one report that is scheduled to be completed by February 14, 1994.

OU 4 Drilling and Surveying Complete - In support of the OU 4 Phase I RFI/RI Work Plan implementation, vertical drilling in Pond 207 B North and sealing activities, necessary to restore liner integrity and final surveying, were completed in November 1993. Drilling operations in Pond 207 B Center were completed on November 24, 1993.

Solar Pond Closure Meetings Held with Regulators - Solar Ponds closure and Phase I remediation is currently being planned in an IM/IRA DD. Weekly meetings were held with the regulators to obtain early input on issues such as COCs, applicable or relevant and appropriate requirements and hot spot remediation. This interactive approach to developing the DD is necessary to meet the obligations from the September 1993 OU 4 dispute resolution.

Solar Pond Wastes to be Moved to New Tank Farm - Prior to closing the Solar Ponds, the wastes currently stored in the ponds will be moved to a new tank farm in the tents on the 750 Storage Pad. The poly tank procurement continues. The first tanks will arrive on plant site in December 1993. The design for relocating the tent heaters and the tank layout design was completed. The relocation of the tent heaters in Tent 3 was completed, and the relocation of the tent heaters for Tent 4 is under way. All activities required to receive tanks in Tent 3 were completed. The Heater/Soaker Relocation SOW was approved for construction to allow for operations to continue through the winter.

OU 7 Regulatory Negotiations Continue - Negotiations with CDH and EPA continue relative to streamlining the IAG schedule for OU 7 by integrating the IM/IRA process with Phase I and II assessments. This will eliminate the Phase I RFI/RI Report and Phase II RFI/RI Work Plan and Report. The regulatory agencies support this effort. The modification to the subcontract supporting IM/IRA was submitted to RFP Procurement who has projected award prior to the end of December 1993.

OU 16 IHSS Status - A preferred alternative was announced to address OU 16. The preferred remedy for the soils is the "No Action" alternative for IHSSs 185, 192, 193, 194, 195 within OU 16. These hazardous sites currently present no risk to human health and the environment. Past cleanup actions or natural processes have eliminated the hazardous substances. However, previous cleanup actions and natural processes may not have eliminated the hazardous

substances for IHSSs 196 and 197 within OU 16. Therefore, IHSSs 196 and 197 will be transferred for further investigation into OU 5 and OU 13, respectively. A public comment period will be held concurrently for both the Proposed Plan and the Draft Permit Modification. The comment period will be from November 8, 1993 to January 7, 1994. A public hearing will be held on December 8, 1993.

Issues/Problems

Vacuum Trouble Plan Awaiting CDH Approval - DOE was briefed on all operations and technical risk considerations related to the use of the vacuum truck service to remove sludge from the Solar Ponds. On November 10, 1993, authorization was given to proceed with the vacuum truck sludge transport option. The goal is to have the vacuum truck in operation emptying the Pond 207 B South by the end of December 1993. RFP Construction completed the placement of gravel to upgrade the road near the Pond 207 B South to accommodate the vacuum trucks. Operations can not begin until CDH approves the requested change to Interim status for this storage. Approval must be received by December 17, 1993, to meet the schedule goal.

Data Aggregation Causes Impasse - A stop work directive was received from the regulatory agencies in August 1993 on sections of the baseline risk assessment. This stop work order allowed the parties to the IAG time to evaluate the Gilbert proposal for identifying COCs. This issue was resolved. The second issue under the stop work order is the method of data aggregation. Data aggregation for the FHRA has different requirements under the CERCLA and the RCRA. A meeting was held between DOE and RFP regarding the proposal for the data aggregation issue. The proposal was discussed and revisions are being made. The proposal will then be presented to EPA and CDH in an attempt to resolve the current impasse over the data aggregation issue.

Interim Status for Solar Ponds Requested - Several changes to Interim Status for Solar Ponds storage areas are necessary to support OU 4 IAG activities. DOE is preparing to transmit the requests to CDH. Two of the changes are crucial to the OU 4 schedules. (1) CDH's approval for storage of the pond sludge in tanks on the 750 Pad is on the critical path to meeting DOE's schedule challenge for emptying the ponds. While a large amount of information on the tank system was provided to CDH, an item-by-item response to the relevant regulations in six Code of Colorado Regulations 1007-3 was requested. The RFP permitting staff are discussing the request with CDH to ensure that they understand what is needed, and a draft response is simultaneously being prepared. Delay in receiving CDH's approval would result in missing the DOE challenge date. (2) CDH approval is needed to store drill cuttings, which were generated by field investigation work in the 207 B ponds. The drill cuttings are currently stored in a 90-day area. At the end of November 1993, there are 65 days before the 90-day storage limit expires.

ORR Completion Delaying of Surface Soil Sampling - Problems with the completion of the Operational Readiness Review are delaying the initiation of surficial soil sampling in OU 10. Additional comments were sent from DOE to RFP on the IA HSP. Consequently, all field work for OU 10 was suspended until comments on the IA HSP are resolved. It is anticipated that the date for initiating field work will be December 8, 1993.

Appendix A

Appendix A contains the status of submittals and permits from CDH consisting of two sections. The first section contains information regarding RCRA submittals and guidance while the second section contains the status of the RCRA Part B Permit.

RCRA Miscellaneous Submittals and Guidance

Permit/Compliance Activity	Date	Comments
Description of Submittal/Guidance Request		
Closure Plans for Interim Status Units	TBD	In preparation
Supplemental to Part B Application for Organic Air Emission	2/27/92	Awaiting CDH approval
Request to delete Organic Air Monitoring		In preparation
Change to Interim Status Closure Plan	7/12/93	Awaiting CDH approval

RCRA Part B Permit

Permit/Compliance Activity Description	Permit MOD Number	Application Date	Date	Comments
Original Permit			9/30/91	
Modification for Miscellaneous Corrections	Request #1	10/28/91	4/30/92	
Modification for Miscellaneous Corrections	Request #2	11/6/91	N/A	CDH approval not required
Modification for Training Compliance	Request #3	12/31/91	N/A	CDH approval not required
Modification for Counters and Waste Codes	Request #4	1/15/92	6/9/92	
Modification for Training Section Revision	Request #5	1/29/92	TBD	RFP to resubmit
Modification for Part 3 Reformat	Request #6	2/25/92	N/A	CDH approval not required
Modification for Reformat Remainder of Permit	Request #7	3/20/92	N/A	CDH approval not required
Modification for Mixed Residues	Request #8	6/30/93	TBD	Awaiting CDH approval
Modification for Centralized Waste Storage	Request #TBD	TBD		In preparation
Modification for Phase I of Building 374 Evaporator Upgrade	Request #9	8/26/92	TBD	Awaiting CDH approval
Modification for Contingency Plan and Code Additions	Request #10	TBD	TBD	In preparation
Modification for Interim Status Units	Request #12	11/6/92	TBD	Awaiting CDH approval
Reverse Permit Request #14	6/16/93	TBD	Awaiting CDH issuance	Mixed Residue
Request #15	Aug 93	TBD	Awaiting	CDH approval

CDH - LISA WEEKS SEE THIS IS NOT ACCURATE.

Appendix B
LDR FFCA II PROGRAM (CTMP)
EPA Primary and Secondary Milestones

Milestones	Waste Treatment Systems					
	1A. Solvent Contaminated Wastes Treatment System Thermal	1B. LLM Solvent Contaminated Wastes Treatment System - Non-Thermal	2. LLM Solidified Bypass Sludge Treatment System	3. LLM Miscellaneous Waste Forms Treatment System	4. LLM Bulking 374/774 Treatment System	5. LLM Surface Organics Removal, Leaded Gloves, Bulk Lead Treatment System
1. Start Treatability Study Exemption (TSE) preparation	N/A	Jul-94	Jul-94	Jan-95	Oct 92 Completed	Dec 92 Completed
2. Submission of the Treatability Study Exemption	N/A	Aug-94	Aug-94	Feb-95	Nov 92 Completed	Feb 93 Completed
3. Start Non-radioactive (Cold) Experimental Phase	N/A	Oct 94	Oct 94	Apr-95	Jan 93 Completed	Apr 93 Completed
4. Decide to Proceed with F&D Permit Application	Oct 92 Completed	Oct 97	N/A	N/A	May 93 Completed	Apr 94
5. Start Preparation of R&D Permit Application	Nov 92 Completed	Nov 97	N/A	N/A	Jun 93 Completed	May 94
6. Submission of the R&D Permit Application	May 93 Completed	May-98	N/A	N/A	Dec-93	Jun-94
7. Start Cold Demonstration Phase	Nov 93	Nov 98	N/A	N/A	Dec-94	Jan-95
8. Decide to Proceed with Part B Permit Application Modification	Jun-94	Nov-00	Jul 95	Aug-95	Oct-95	Nov-96
9. Start Part B Permit Application Modification Approval	Jul 94	Jan-01	Aug-95	Sep-95	Dec-95	Jan-97
10. Complete Title II Engineering	Dec 96	Jan-03	Jul-97	Nov-96	Dec-96	Jun-98
11. Submission of the Part B Permit Application Modification	Jan-97	Feb-03	Aug-97	Dec-96	Jan-97	Jul-98
12. Receive Part B Permit Application Modification Approval	Jan 99	Feb-05	Aug 99	Dec-98	Jan-99	Jul-00
13. Complete Construction	Jan-03	Feb-08	Feb-03	Dec-01	Jan-03	Jul-03
14. Initiation of Systems Op Testing on Production System/Facility	Jan-04	Feb-10	Feb-04	Dec-02	Jan-04	Jul-04
15. Complete Operational Readiness Review (ORR)	Jan-05	Aug 11	Aug 05	Jun-04	Jul-05	Jul-06
16. Start Cold Startup Phase	Feb-05	Sep-11	Sep-05	Jul-04	Aug-05	Feb-06
17. Start Radioactive (Hot) Startup Phase	Dec-05	Oct-12	Oct 06	Aug-05	Sep-05	Mar-07
18. Submission of a Waste Processing Schedule	Jan-06	Nov 12	Nov 06	Sep-05	Oct-05	Apr-07

Note: Italicized entries represent primary milestones

EPA approval of location may be needed prior to submission of Part B Permit Application Modification

*Completion of these milestones by the projected dates is not within DOE's control. Permit approval received beyond these dates will result in a comparable slip to subsequent milestones

Appendix C

CLEAN AIR ACT PERMITS

BUILDING/EMISSION SOURCE	PERMIT #	PERMIT STATUS	COMMENTS
Bldg 122 Incinerator (3/25/82)	C 12 931	Final Permit (Inactive Source)	Requested Permit cancellation 12/93
Bldg 771 Incinerator (8/28/85)	12JE932	Final Permit (Inactive Source)	Requested Permit cancellation 12/93
Bldg 776 Incinerator (3/25/82)	C 13 022	Final Permit (Inactive Source)	Requested Permit cancellation 12/93
Fugitive Dust Renewed (12/26/91)	87JE084L	Final Permit	Expires 12/31/94
Bldg 123 Uralsysis Fume Hood	86JE018	Final Permit	Requested Permit cancellation 12/93
Bldg 776 Supercompactor and Repackaging Facility (SARF) Transuranic Waste Shredder HEPA filter	91JE047	Initial Permit issued 12/91	Awaiting Final Permit
Bldg 333 paint spray booth	91JE300 1	Initial Permit issued 7/31/92	Requested Permit cancellation 12/93
Bldg 333 grit blaster	91JE300 2	Initial Permit issued 7/31/92	Awaiting Final Permit
Bldg 910 3 nat. gas generators	91JE316 1	Initial Permit issued 7/31/92	Awaiting Final Permit
Bldg 910 1 nat. gas water htr	91JE316 2	Final Permit 2/18/93	
Bldg 995 nat. gas fired sludge dryer	91JE430	Initial Permit issued 2/11/92	Requested Permit cancellation 12/93
Bldg 440 paint spray booth	91JE537 1	Final permit 5/12/92	Requested Permit cancellation 12/93
Bldg 440 paint spray booth	91JE537 2	Final permit 5/12/91	Requested Permit cancellation 12/93
Bldg 373 Vent 1 Detroit diesel engine pump	92JE473	Initial permit issued 3/9/93	Awaiting Final Permit
Bldg 460 Machining and product inspection processing/high bay vents	92JE1247	Initial permit issued 3/11/93	Awaiting permit cancellation in process of revising APEN for these operations VOC emission now less than 1 ton/year Below threshold for permit and APEN
Open Burn Permit	1140 OB 1001	Final Permit	Permit expires 10/31/93
Steam Plant 4 Boilers	92JE833	Initial Permit Pending	Under review for initial permit
Bldg 374 Salt Spray Dryer	93JE542	Initial Permit Pending	Under review for need for permit
Emergency Generators (Bldg 120 566 708(B) 708(C) 715A, 776 881G 920 762A (PACS 1) 372A (PACS 2) 792A(PACS 3) Portables A and B		Application Submitted CDH 10/21/93	See narrative section
Bldg 708 & 711 diesel pumps and emergency generators Bldgs 124 127 371 427 443 559 562 708(A) 715 727 729 779 827 989			See narrative section
Environmental Restoration Emergency Generator Trailer			See narrative section
Bldg 928 diesel pump			See narrative section
Davey Diesel Air Compressor			See narrative section
OU2 generator	N/A	submitted to CDH 8/93	Under review for initial permit

Appendix D NEAR-TERM IAG MILESTONES

IAG Date Scheduled
to EPA/CDH

OU#	Milestone Description	IAG Date Scheduled to EPA/CDH	Status
2 ^a	Submit Draft Phase II RF/RI Report	12 Mar 93	Extension denied/delinquent
2 ^a	Submit Final Treatability Test Report	13 Jul 93	Extension to 8 Sep 93 (delinquent)
3 ^a	Submit Draft Phase I RF/RI Report	16 Jul 93	Extension to 14 Feb 94
6 ^a	Submit Draft Phase I RF/RI Report	4 Aug 93	Extension to 10 Jun 94
2 ^a	Submit Final Phase II RF/RI Report	9 Aug 93	Extension denied/delinquent
7 ^a	Submit Draft Phase I RF/RI Report	12 Oct 93	.
4	Submit Final Phase I RF/RI Report	18 Oct 93	Deleted
2 ^a	Submit Draft CMS/FS Report	04 Nov 93	.
1 ^a	Submit Final Phase III RF/RI Report	04 Jan 93	Extension to 15 Nov 93
5 ^a	Submit Draft Phase I RF/RI Report	30 Nov 93	Extension request submitted
3 ^a	Submit Final Phase I RF/RI Report	13 Dec 93	Extension to 21 Oct 94
1 ^a	Submit Draft Proposed Plan	27 Sep 93	Extension request submitted
1 ^a	Submit Final Proposed Plan	04 Jan 94	Extension request submitted
6 ^a	Submit Final Phase I RF/RI Report	07 Jan 94	Extension to 18 Nov 94
1 ^a	Submit Draft CMS/FS Report	31 Mar 93	Extension to 11 Feb 94
8	Submit Draft Phase I RF/RI Report	14 Feb 94	.
7 ^a	Submit Final Phase I RF/RI Report	16 Mar 94	.
9	Submit Final Phase I RF/RI Report	11 Apr 94	.
4	Submit Draft Phase I Proposed IM/IRA Decision Document	14 Apr 94	On schedule
12	Submit Draft Phase I RF/RI Report	20 Apr 94	Extension request submitted
4	Submit Draft Phase II Work Plan	22 Apr 94	On schedule
5 ^a	Submit Final Phase I RF/RI Report	03 May 94	Extension request submitted
1 ^a	Submit Draft Responsiveness Summary	06 May 94	.
2 ^a	Submit Final CMS/FS Report	10 May 94	.
2 ^a	Submit Draft Proposed Plan	10 May 94	.
8	Submit Final Phase I RF/RI Report	12 Jul 94	.
15	Submit Draft Phase I RF/RI Report	01 Aug 94	On schedule
1 ^a	Submit Final CMS/FS Report	03 Aug 94	.
1 ^a	Submit Draft CAD/ROD	03 Aug 94	.
1 ^a	Submit Final Responsiveness Summary	03 Aug 94	.
1 ^a	Submit Draft CAD/ROD	03 Aug 94	.
13	Submit Draft Phase I RF/RI Report	08 Aug 94	.
2 ^a	Submit Final Proposed Plan	09 Aug 94	.
10	Submit Draft Phase I RF/RI Report	25 Aug 94	.
9	Submit Final Phase I RF/RI Report	06 Sep 94	.
4	Submit Final Phase I Proposed IM/IRA Decision Document	24 Jun 94	On schedule
7 ^a	Submit Draft Phase II RF/RI Work Plan	13 Sep 94	.
12	Submit Final Phase I RF/RI Report	15 Sep 94	Extension request submitted
4	Submit Final Phase II RF/RI Work Plan	19 Sep 94	.
11	Submit Draft Phase I RF/RI Report	20 Sep 94	.
1 ^a	Submit Final CAD/ROD	01 Nov 94	.
4	Submit IM/IRA Responsiveness Summary	01 Nov 94	On schedule

Behind original IAG schedule extension required

^a OU 2 through OU 7 may require additional extensions because of HHRA issues work stoppage.